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7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

9 MARYJANE DORSEY, an individual; ) Case No. 2:19-cv-02070-JAD-BNW  
10 )  
11 Plaintiff, )  
12 vs. ) **STIPULATION AND ORDER TO**  
13 ) **EXTEND SCHEDULING**  
14 ) **ORDER DEADLINES**  
15 ) **(Third Request)**  
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IT IS HEREBY STIPULATED AND AGREED by and between the parties' counsel of record that the Scheduling Order deadlines in this case be extended as follows:

Discovery Deadline	March 31, 2021
Dispositive Motion Deadline	April 30, 2021
Joint Pretrial Order	May 31, 2021 or 30 days from the ruling on a dispositive motion

This is the third request for an extension of these deadlines. The parties provide the following information to the Court regarding the proposed extension of the discovery deadline.

### *Discovery Completed to Date*

The parties have served their Initial Disclosures. Various records have been subpoenaed. Defendants have served interrogatories and requests for production, and Plaintiff has responded. Plaintiff has served interrogatories, requests for admissions and requests for production. The first day of Plaintiff's deposition was completed December 11, 2020.

### ***Remaining Discovery to Be Completed***

The second day of a deposition of Plaintiff, possible depositions of current and former employees of Defendant, and a Rule 30(b)(6) deposition of Defendant.

### *Reasons Discovery Could Not Be Completed Within the Existing Deadline*

Since the Court issued its November 12, 2020 Order (ECF No. 22) partially extending further discovery, Defendant has been working on responses to Plaintiff's discovery requests, which consist of 26 interrogatories, 12 requests for production and 24 requests for admission. Defense counsel and his Paralegal have spent considerable time going through several hundred pages of documents and other materials (e.g., surveillance tapes) to properly respond to these requests. Once responses are served (due December 28), Plaintiff will be able to finalize her Rule 30(b)(6) topics.

Plaintiff was deposed for an entire day on December 11, 2020. Considerable time was spent preparing for this deposition, generating a 16-page outline of questions and topics. Not only was there a lot of documentation on the defense side of the equation, but Plaintiff kept her own voluminous documents which needed to be reviewed. To give one example, after her termination, Plaintiff prepared a 39-page narrative of various events occurring during her employment (used during the deposition as Exhibit E).

1 During her deposition, Plaintiff testified that she had an estimated 20-50  
2 recordings of conversations she taped during her employment, including various key  
3 events such as, but not limited to, due process meetings with Human Resources and the  
4 incident which led to her termination. None of these recordings were available to  
5 Defendant prior to the deposition.<sup>1</sup> At the end of the day, Defendant continued the  
6 deposition until it was able to receive and listen to the tapes, which have been requested  
7 from Plaintiff's counsel since the deposition. Not only do these tapes impact Plaintiff's  
8 deposition, but the content could impact further discovery to be done, and it will take  
9 some time to listen to these tapes given the number involved.

11        Aside from these specific issues, the ongoing pandemic and upcoming holidays  
12      impacts scheduling.

### ***Proposed Dates for Completion of Discovery***

15 The parties believe they will be able to complete discovery by the proposed new  
16 date of March 31, 2021.

17 HATFIELD & ASSOCIATES

FISHER & PHILLIPS LLP

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## ORDER

## IT IS SO ORDERED

**DATED:** 4:43 pm, December 22, 2020

Geert Wevers

<sup>28</sup> <sup>1</sup> A prior response to a discovery request suggested no recordings existed.